

REMARKS

Claims 1-12 remain pending in the present application. Claims 13-15 have been withdrawn by the Examiner. Claims 1 and 7 have been amended. Basis for the amendments can be found throughout the specification, drawings and claims as originally filed.

REJECTION UNDER 35 U.S.C. § 103

The Examiner has rejected Claims 1-12 under 35 U.S.C. §103(a) alleging them to unpatentable over Fridman (U.S. Patent No. 6,390,738) in view of Gray (U.S. Patent No. 2,842,860) and further in view of Pennebaker et al. (US. Patent No. 5,145,221). The Examiner alleges that this combination would render Applicants' invention obvious to those skilled in the art.

Independent Claim 1 has been amended. Independent Claim 1 further defines that the opposing rails are coupled together to enable the pair of hole saw guides to move towards and away from one another.

The art relied on by Examiner fails to disclose or suggest Applicants' invention. The Fridman reference cited by the Examiner illustrates a pair of ears 26A and 26B which receive pins 28A and 28B to fixedly secure the block 18 at the pinned positions through holes 30. The Examiner alleges that these ears 26A and 26B are equivalent to Applicants' opposed rails. Clearly, this is not the case. Applicants have further claimed the rails to be coupled together to enable movement of the holesaw guides towards and away from one another. This is unlike the Examiner's combination where the alleged rails are not coupled with one another. Further, the Examiner combines Gray and Pennebaker et al. in an attempt to render Applicants' invention obvious. However, there

is no reasoning by the Examiner as to why these references would become combined with the primary Fridman reference. There is no remote disclosure or suggestion that Gray or Pennebaker et al. would be combined with a jig for drilling door knob holes. Clearly, the Examiner is using hindsight reconstruction in an attempt to render Applicants' invention obvious. The Examiner is utilizing impermissible hindsight to pick and choose elements from these references, in an attempt to render Applicants' invention obvious, that have no relationship to one another. Clearly, there is no reason why, other than the Examiner's conclusion, to combine these three references.

Accordingly, Applicants believe Claim 1, as well as dependent Claims 2-6, to be patentably distinct over the art cited by the Examiner.

Independent Claim 7 has been amended to be patterned after Claim 1. Accordingly, the above remarks with respect to Claim 1 equally apply to Claim 7. Thus, Applicants believe Claim 7, as well as dependent Claims 8-12, to be patentably distinct over the art cited by the Examiner.

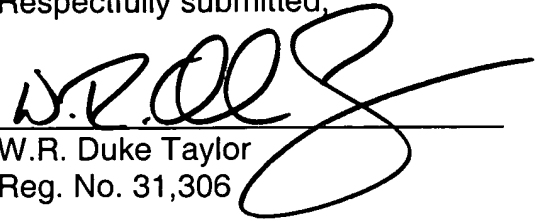
In light of the above amendments and remarks, Applicants submit that all pending claims are in condition for allowance. Accordingly, Applicant respectfully requests the Examiner to pass the case to issue at her earliest possible convenience.

Should the Examiner have any questions regarding the present application, she should not hesitate to contact the undersigned at (248) 641-1600.

Respectfully submitted,

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